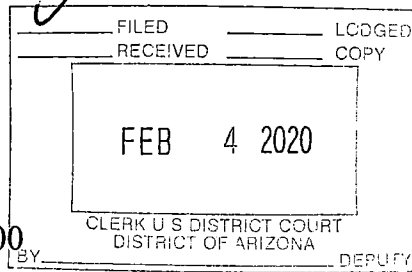


1 MICHAEL BAILEY  
2 United States Attorney  
3 District of Arizona  
4 ROBERT A. FELLRATH  
5 Assistant U.S. Attorney  
6 United States Courthouse  
405 W. Congress Street, Suite 4800  
Tucson, Arizona 85701  
Telephone: 520-620-7300  
Email: [robert.fellrath@usdoj.gov](mailto:robert.fellrath@usdoj.gov)  
Attorneys for Plaintiff



7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE DISTRICT OF ARIZONA

9 United States of America,

10 Plaintiff,

11 vs.

12 Juan Antonio Corella,

13 Defendant.  
14

Mag. No. 20-08456M(DTF)

STIPULATION AND JOINT MOTION  
FOR RELEASE OF MATERIAL  
WITNESSES WITHOUT TAKING  
VIDEO DEPOSITION

15 The United States of America, through undersigned counsel, and the defendant,  
16 individually and through counsel, do hereby agree and stipulate as follows:

17 1. Raul Bonifacio-Mauricio, Gustavo Gonzalez-Soriano, and Juventino Rojas-  
18 Cuchillo (hereinafter referred to as "material witnesses"), are not natural born or  
19 naturalized citizens, legal permanent residents, or nationals of the United States;

20 2. The material witnesses entered the United States illegally on or about January  
21 8, 2020;

22 3. The material witnesses were transported in the vehicle where defendant Juan  
23 Antonio Corella was the driver;

24 4. The parties also jointly agree that as a result of this stipulation, the material  
25 witnesses will be returned to their country of origin and thus unavailable as defined in Fed.  
26 R. Evid. 804;

27 5. Therefore, the parties agree that the government may elicit hearsay testimony  
28 from any agent regarding any statements made by the above-referenced material witnesses

1 contained in the disclosure, and such testimony shall be admitted as substantive evidence  
2 in any hearing or trial in the above captioned matter.

3 Based on the foregoing, the parties jointly move for the release of the above-named  
4 material witnesses to the Department of Homeland Security for return to their country of  
5 origin.


6 MICHAEL BAILEY  
7 United States Attorney  
8 District of Arizona

9   
10 ROBERT A. FELLRATH  
11 Assistant U.S. Attorney

12 I translated or caused to be translated this agreement from English into Spanish to  
13 the defendant on the 4<sup>th</sup> day of February, 2020.

14   
15 Jessica Holly Turk, Esq.  
16 Attorney for Defendant

17 I understand and agree to the terms of this stipulation.

18   
19 Juan Antonio Corella  
20 Defendant